

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 14-22325 JAD
Andrea N. Bullock,	:	
Debtor,	:	
	:	Chapter 13
Belmar Gardens, Inc.,	:	
Movant,	:	Doc. No.
	:	Related to Doc. No.126
v.	:	
Andrea N. Bullock, and	:	Hearing Date: 04/05/17 9:30 a.m.
Ronda J. Winnecour, Chapter 13 Trustee,	:	
Respondents.	:	Response due: 03/26/17

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now comes the Debtor, by and through her attorney, Francis E. Corbett, and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. The Debtor has resumed payments by making 2 payments of \$925.00 each dated March 1, 2017 and posted on the Trustee's website of March 6, 2017. The Debtor was out of work for a period of time and has now obtained new employment making more money that she had previously.
7. Denied. The Movant has assessed late charges each month that the case has been active, in spite of the Debtor's monthly payments to the Trustee and the Trustee's monthly disbursements to this creditor.

8. Denied. The Debtor still has the opportunity to cure the existing plan default and the arrearages on the Movant's account in the remaining 27 months of the plan.

9. Denied. The regular payments made throughout most of this case, and the resumption of payments following her re-employment provide adequate protection of this creditor's interest.

10. Denied. The unit is the Debtor's residence.

11. Denied. The Debtor has invested a significant amount of money in this unit and uses it as her residence.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order denying the relief requested in the motion.

Date: 03/21/17

s/ Francis E. Corbett
Francis E. Corbett, Esquire PA I.D. #37594
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310 Grant Street, Suite 1420
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(412) 456-1882

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**CERTIFICATE OF SERVICE OF RESPONSE TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I certify that I served the above captioned pleading on the parties on the attached list via NECF on March 21, 2017:

Ronda J. Winnecour, Chapter 13 Trustee cmecf@chapter13trusteedpa.com
Office of the U.S. Trustee ustpreregion03.pi.ecf@usdoj.gov
Mary Bower Sheats, Esquire mbsheats@fbmagg.com

The type of service made on the debtor was First Class Mail.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: 03/21/17

s/Francis E. Corbett
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